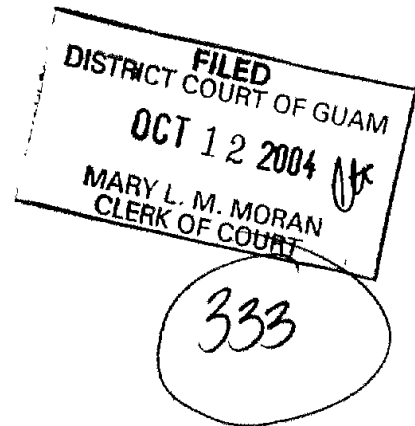


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IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)
SADHWANI, and K. SADHWANI'S)
INC., a Guam corporation,)
)
Plaintiffs,)
)
v.)
)
HONGKONG AND SHANGHAI)
BANKING CORPORATION, LTD.,)
et al.,)
Defendants.)
_____)

CIVIL CASE NO. 03-00036

**NOTICE OF EX PARTE
APPLICATION ON HSBC'S
OBJECTIONS TO MAGISTRATE
JUDGE'S ORAL ORDER DENYING
MOTION FOR PROTECTIVE
ORDER**

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

NOTICE IS HEREBY GIVEN that on _____, 2004, at the hour of _____.m.,
Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") will bring the
following Ex Parte Application before the Court.

Concurrently with this Ex Parte Application, HSBC has filed its Objections to Magistrate Judge's Oral Order Denying Motion for Protective Order ("Objections"). It is important and urgent that the Ex Parte Application and Objections be heard as soon as possible because Plaintiffs improperly noticed in Guam the depositions of Christopher Page and Magnus Montan, Hong Kong residents, for October 12 and 14, 2004, respectively, the Magistrate Judge denied HSBC's Motion for a Protective Order, and the Magistrate Judge refused to stay his oral Order pending a decision by this Court on the Objections, as more particularly shown in the supporting memorandum of points and authorities and declarations filed herein.

This Ex Parte Application is supported by the pleadings previously filed in this case and by the record before this Court. Further grounds are also set forth in the Objections filed concurrently herewith, the Memorandum of Points and Authorities in support of said Objections, and the documents on file herein all being incorporated herein by this reference. This Ex Parte Application is further supported by the Declarations of Jacques G. Bronze, filed October 8, 2004, and concurrently filed herewith.

Dated this 11th day of October, 2004.

LAW OFFICES OF BRONZE & TANG
Attorneys for Defendant The Hongkong and Shanghai
Banking Corporation Ltd.

By:


JACQUES G. BRONZE

RAP/nsh